

# **EXHIBIT A**

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

In re:

Chapter 9

City of Detroit, Michigan,

Case No. 13-53846

Debtor.

Hon. Thomas J. Tucker

**DECLARATION OF MARK YOUNG, PRESIDENT OF THE DETROIT POLICE  
LIEUTENANTS AND SERGEANTS ASSOCIATION  
IN SUPPORT OF THE DPLSA's RESPONSE TO THE CITY's MOTION FOR  
(I) DETERMINATION THAT THE DETROIT POLICE LIEUTENANTS AND  
SERGEANTS ASSOCIATION HAS VIOLATED THE TERMS OF THE CITY OF  
DETROIT's CONFIRMED PLAN OF ADJUSTMENT AND THE ORDER  
CONFIRMING IT; AND (II) ORDER (A) ENJOINING FURTHER VIOLATIONS  
AND (B) REQUIRING DISMISSAL OF STATE ACTIONS**

I, Mark Young, President of the Detroit Police Lieutenants and Sergeants Association, declare as follows:

1. I am the current President of the Detroit Police Lieutenants and Sergeants Association, the exclusive bargaining representative for the purpose of collective bargaining with respect to wages, hours and other conditions of employment for employees of the City of Detroit Police Department in the following classifications: Police Investigator, Detectives, Police Sergeant, Police Sergeant-Promotional List, Senior Communications Officer-Police Sergeant, Senior Radio Maintenance Officer-Police Sergeant, Police Sergeant-Chemist, Police Lieutenant, Assistant Supervisor of Operations-Police Lieutenant, Supervisor of Radio Systems and Planning-Police Lieutenant, Supervisor of Operations-Police Lieutenant, Supervisor of Radio Maintenance-Police Lieutenant, Supervisor of Firearms Identification and Explosives-Police Lieutenant.

I make this declaration based on my personal knowledge, and if called upon to do so, I could and would testify to the facts set forth herein.

2. I am responsible for the day to day administration of the Union including but not necessarily limited to contract administration, collective bargaining, negotiations, the processing of grievances, and when deemed necessary the filing of unfair labor practice charges and labor related lawsuits;

3. The DPLSA currently consists of approximately 571 active lieutenants and sergeants serving the City's police department, doing their best to provide effective public safety services to the City of Detroit under improving but still difficult conditions;

4. The DPLSA estimates that 12 of those active police lieutenants and sergeants have spouses who are City retirees (the "Retired Spouses") and had enrolled their retired spouses under one of the health plans offered under the terms of the 2014-2019 collective bargaining agreement. The collective bargaining agreement makes reference to the plan documents of each of the providers as identified by Certificates of Coverage.

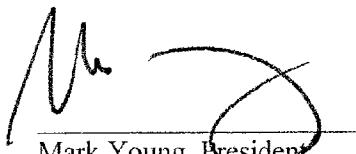
5. After nearly eight (8) months of intensive court-ordered mediation, the DPLSA on or about May 5, 2014, executed a term sheet with the City through which its leadership agreed to certain economic terms, agreed to support the Plan of Adjustment (including pension reductions) and agreed to continue negotiating the terms of what ultimately became the DPLSA's collective bargaining agreement with the City ("CBA"). The finalized CBA was ratified by the membership and duly authorized, approved and signed by the State Treasurer and Detroit Emergency Manager and the DPLSA on November 6, 2014. The CBA was incorporated into the Chapter 9 City of Detroit Plan of Adjustment.

6. The terms of the Hospitalization coverage contained in Article 43 of the CBA permit active DPLSA members to include their spouse in medical coverage. Neither the explicit language of the CBA nor any of the provider plans restrict or limit participation in spousal coverage to only those spouses who are not retirees of the City.

7. After the DPLSA executed the 2014-2019 CBA, the City on January 8, 2015, sent notice to retired spouses of active DPLSA members that it would terminate their medical coverage on the active medical plan effective February 1, 2015.

8. The DPLSA disputed the City's right to terminate the medical coverage of the retired spouses and notified the Mayor's office, the Human Resources Department, and City Council of its objection and concerns. The DPLSA requested that coverage be reinstated. The City refused to reinstate coverage. Consequently, the DPLSA authorized efforts to obtain legal relief.

Dated: April 10, 2015



Mark Young, President  
Detroit Police Lieutenants and Sergeants Association